

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff,

Plaintiff,

v.

ABN AMRO BANK N.V. (presently known
as NATWEST MARKETS N.V.),

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Lead Adv. Pro. No. 10-05354 (CGM)

STIPULATION AND ORDER

Plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-*lll*, and the chapter 7 estate of Bernard L. Madoff individually, and defendant ABN AMRO Bank N.V. (presently known as NatWest Markets N.V.) (“Defendant,” together with the Trustee, the “Parties”), by and through their respective undersigned counsel, hereby agree as follows:

WHEREAS, on August 24, 2023, Defendant filed Amended Counterclaims against the Trustee. ECF No. 276.

WHEREAS, the Parties have agreed to a schedule for litigation of Defendant's Amended Counterclaims.

IT IS HEREBY STIPULATED AND AGREED that:

1. The Trustee shall file his motion to dismiss Defendant's Amended Counterclaims on or before September 27, 2023.
2. Defendant shall file its opposition to the Trustee's motion to dismiss by or on October 27, 2023.
3. The Trustee shall file his reply in further support of his motion to dismiss by or on November 10, 2023.
4. The hearing on the Trustee's motion to dismiss shall be on November 15, 2023.
5. This Stipulation is so ordered without prejudice to any future stipulations for extensions of time.
6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original.

Date: August 31, 2023
New York, New York

By: /s/ Patrick T. Campbell
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Patrick T. Campbell
Email: pcampbell@bakerlaw.com
Camille C. Bent
Email: cbent@bakerlaw.com
Elizabeth McCurrach
Email: emccurach@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

By: /s/ Michael S. Feldberg
**Reichman Jorgensen Lehman &
Feldberg LLP**
750 Third Avenue, Suite 2400
New York, New York 10017
T: 212.381.4970
Michael Feldberg
Email: mfeldberg@reichmanjorgensen.com

*Attorneys for Defendant ABN AMRO Bank
N.V. (presently known as NatWest Markets
N.V.)*

SO ORDERED.

Dated: September 6, 2023
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge